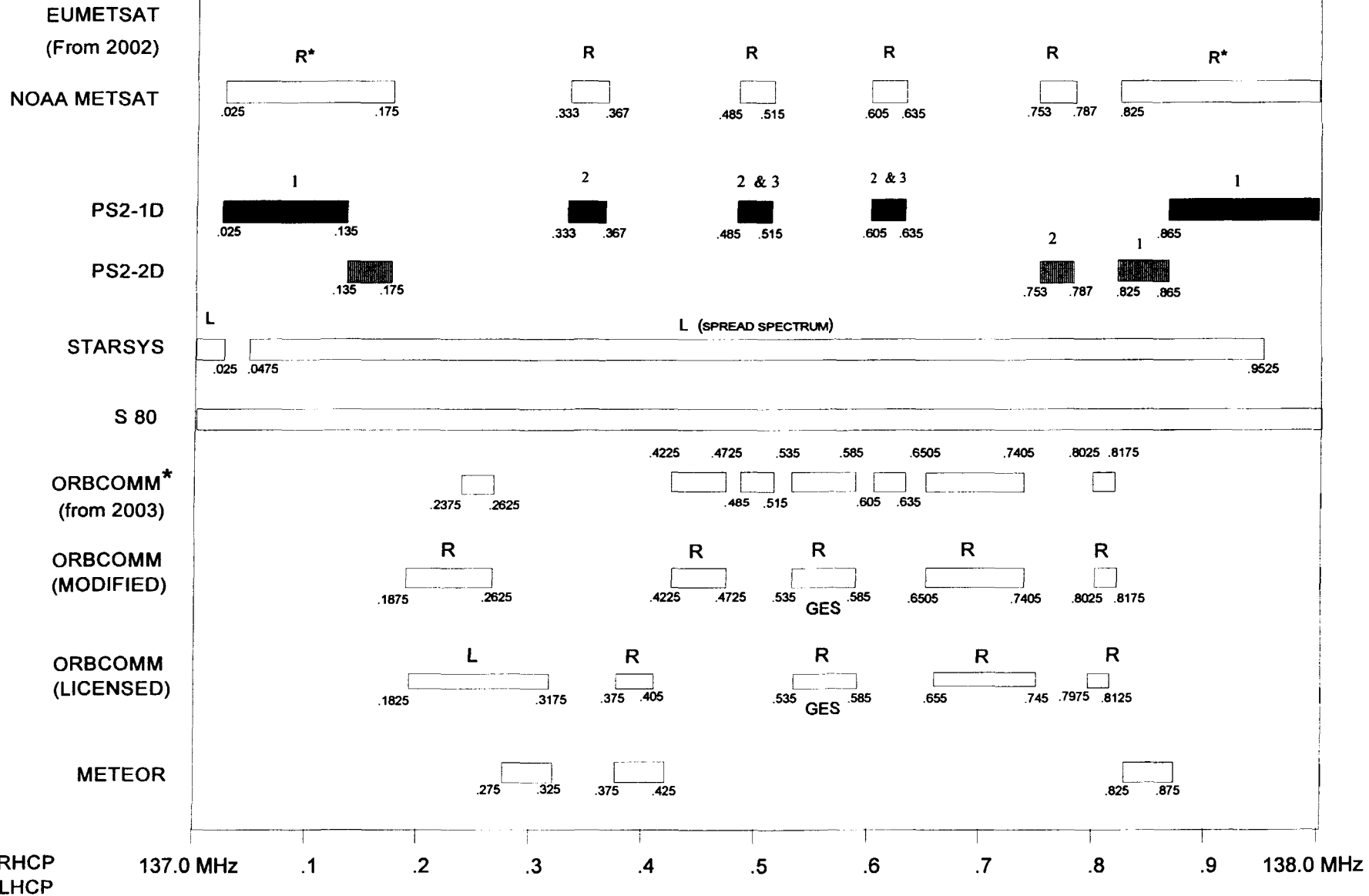


Final Analysis Alternative Proposal 2

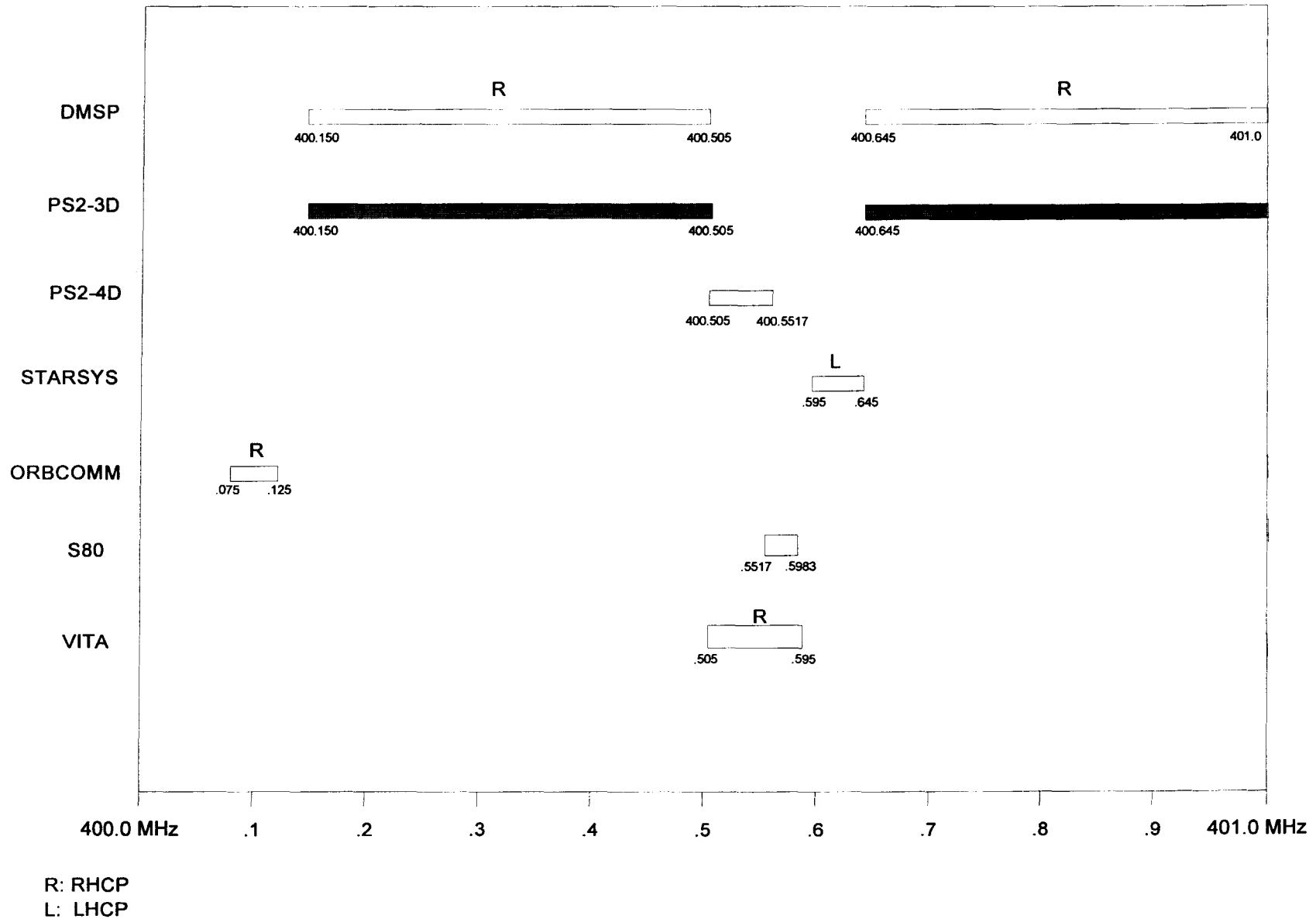
137.0 - 138.0 MHz Downlink Band



- *. Effective 2003, NOAA will begin using the Subband (one satellite in 2003, and second satellite in 2007) and Orbcomm will have to migrate its channels from 0.185-0.2375 to two of NOAA's channels
1. These bands can be used primary till 2002, time share with NOAA afterwards
 2. These channels can be used as secondary unite January 2000, co-primary afterwards
 3. Orbcomm might migrate some of it's operation into these channels when NOAA begins operation in the 137.025-137.175 sub-band, no sooner than 2003

Final Analysis Alternative proposal 2

400.0 - 401.0 MHz Downlink Band



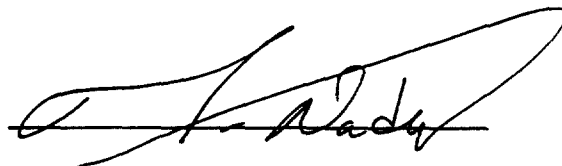
4. these systems must be able to change frequency from one of two proposed channels (per system) to the other channel (of the same system)

AFFIDAVIT OF NADER MODANLO

1. My name is Nader Modanlo. I am President and Chairman of Final Analysis Communication Services, Inc. ("Final Analysis") and President and Chairman of Final Analysis, Inc. ("FAI"). I submit this affidavit pursuant to Section 1.16 of the Commission's rules, 47 C.F.R § 1.16, and in support of Final Analysis's foregoing "Comments" submitted in IB Docket No. 96-220.

2. I have personal knowledge of the matters stated herein. To the best of my knowledge, the facts asserted in Final Analysis's Comments are true and correct.

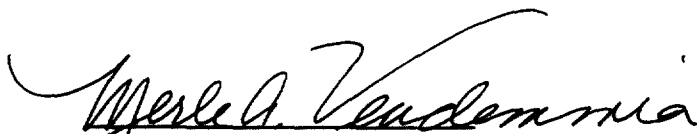
3. I certify under penalty of perjury that the foregoing is true and correct.
Executed on December 20, 1996.



Nader Modanlo

President and Chairman
Final Analysis

SWORN and SUBSCRIBED TO before
me this 20th day of December, 1996


Notary Public

Merle A. Vendemmia
Notary Public, District of Columbia
My Commission Expires Jan. 1, 1998

My Commission expires: _____

CERTIFICATE OF SERVICE

I, Wanda Borrero-Turner, a legal secretary at Kelley Drye & Warren LLP, hereby certify that on this 20th day of December 1996, true copies of the foregoing " Comments of Final Analysis Communications Services, Inc. " have been sent via first-class U.S. mail, postage prepaid, or hand delivered as indicated to:

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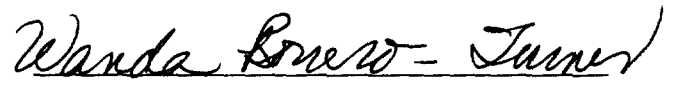
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